

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: David V. Carraway	:	Case No: 19-00429
Debtor	:	
	:	Chapter 13
Delta Borough Municipal Authority	:	
Movant	:	
v.	:	
	:	
David V. Carraway	:	
Respondent	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF
FROM AUTOMATIC STAY**

AND NOW, come the Respondent, David V. Carraway, by and through his attorney, Michael R. Caum, Esquire, to file an Answer to Movant's Motion for Relief from Automatic Stay, and in support thereof, aver the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part. It is admitted that the case was filed as a voluntary Chapter 13 of the Bankruptcy Code on January 31, 2019. Paragraph 4 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.
5. Admitted.
6. Admitted.

7. Denied. Debtor does not believe he owes such a large post-petition arrearage based on the payment history of the account.

8. Denied. The “Proof of Claim” speaks for itself. To the extent that Movant’s characterizations of the Proof of Claim vary from its contents, all such characterizations are denied.

9. Denied. Paragraph 9 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.

10. Denied. After reasonable investigation, Debtor is without sufficient knowledge to form a belief as to Movant’s intentions and therefore all such averments are denied.

11. Denied. \$1,015.00 is an excessive fee for a Motion for Relief from Stay for the amount of the claim.

WHEREFORE the Respondent, David V. Carraway, request this Honorable Court to:

- (a) Deny all relief requested in Movant’s Motion; and,
- (b) Award any and all relief this Honorable Court deems just.

Respectfully Submitted,

Date: 5/22/2020

/s/ Michael R. Caum
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